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September 2, 2025

VIA ECF

The Honorable Karen M. Williams
United States District Judge
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Room 4A
Camden, NJ 08101

Re: *Benton, et al., v. Platkin, et al.*
Docket No. 24-cv-7098(KMW)(MJS)

Dear Judge Williams:

We represent the Plaintiffs in this matter. On Monday, August 25, 2025, Plaintiffs served a deposition subpoena on the New Jersey State Police pursuant to Rule 30(b)(6). The deposition was tentatively scheduled for September 4, 2025.

Counsel for the New Jersey State Police contacted Plaintiffs after service and explained that its 30(b)(6) designee would not be “ready to proceed” on September 4, 2025, and requested “an additional 30 days” for the New Jersey State Police to produce a designee.

Pursuant to the current discovery schedule, fact discovery closes on September 5, 2025. *See* ECF #52 at 1. In order to conduct the deposition of the New Jersey State Police designee, Plaintiffs request an extension of thirty (30) days. This extension will not affect any other deadlines in this case. *See* ECF #52 at 3 (setting dispositive motion deadline as November 21, 2025).

Defendant Matthew Platkin consents “to a thirty-day extension for purposes of this deposition only.”

We thank the Court for its attention to this matter.

Respectfully submitted,
HARFENIST KRAUT & PERLSTEIN, LLP

By:

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cc: All counsel of record (*via ECF*)

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